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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW FOR THE FINAL LONG TERM MONITORING OPTIMIZATION REPORT STUDY
AREA (SA) 2 HERNDON ANNEX NTC ORLANDO FL
2/27/2014
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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RICK SCOTT
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HERSCHEL T. VINYARD JR.
SECRETARY

February 27, 2014

Attn: Mr. Art Sanford
Naval Facilities Engineering Command Southeast
BRAC Program Management Office East
203 S. Davis Drive, Bldg 247
Joint Base Charleston, SC 29404

Subject: Final Long Term Monitoring Optimization Report, Study Area 2 (SA 2) – Herndon Annex,
Former Naval Training Center Orlando, Orlando, Florida

Dear Mr. Sanford:

I have completed my review of the Final Long Term Monitoring Optimization Report, Study Area 2 (SA 2) – Herndon Annex, Former Naval Training Center Orlando, dated November 14, 2013 (received November 19, 2013), prepared and submitted by Resolution Consultants. I have the following comments on the report:

- (1) In Table 3-2, the maximum site concentrations, GCTLs and NADCs for total dissolved solids and sulfate are incorrect. The concentrations presented are in mg/L rather than µg/L. Please fix the table.
- (2) In Section 3.3, second to last paragraph, last sentence, Chapter 62-770.680, F.A.C., is cited. It should be Chapter 62-780.680, F.A.C., as Chapter 62-770, F.A.C., has been repealed.
- (3) In Sections 4.1 and 4.2, the word “limited” is used incorrectly. Rather than using “limited wells” or “limited VOCs”, it should be written as “a limited number of wells” or “a limited number of VOCs”.
- (4) In Section 6.0, third sentence, it says “Contaminants continue to impact groundwater beneath the Azalea Park neighborhood, but water use restrictions are effective in limiting exposure.” Groundwater use restrictions through deed restrictions have only been implemented on former Navy property in Herndon Annex. There are no water use restrictions for the groundwater under Azalea Park. Please fix this statement.
- (5) In Section 7.5, Well Abandonment Recommendations, five active monitoring wells are recommended for abandonment. Wells OLD-02-01A and OLD-02-09A are both screened above the depths that have been determined to be contaminated. However, before the Department can agree these two wells can be abandoned, please provide a history of analysis for these wells. Wells OLD-02-12C and OLD-02-08C should be retained and should be analyzed for VOCs. These wells are screened at depths appropriate for monitoring the potential migration of PCE and TCE from well OLD-02-46DR. The Department concurs that well OLD-02-63D is no longer

Mr. Art Sanford
Final Long Term Monitoring Optimization Report
Study Area 2 (SA 2)
Page 2 of 2
February 27, 2014

required for groundwater monitoring as clean wells OLD-02-59D, OLD-02-64D and OLD-02-65C appear suitably placed to make monitoring unnecessary. I will let you decide whether there is a benefit in keeping the well for water level measurements.

- (6) Figures showing the current plume configurations for the benzene, PCE and TCE plumes would be beneficial in evaluating the conclusions and recommendations made in the report. Likewise, figures showing the potentiometric surface elevations and groundwater flow directions for different depths in the surficial aquifer would be appreciated.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,

A handwritten signature in blue ink, reading "David P. Grabka", with a long horizontal flourish extending to the right.

David P. Grabka, P.G.
Remedial Project Manager
DoD and Brownfields Partnerships
Waste Cleanup Program

cc: Marianne Sweeney, AECOM, Orlando

KAW 